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19           *Attorneys for Plaintiff LT Game  
20           International Ltd.*

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22           **THE UNITED STATES DISTRICT COURT**  
23           **FOR THE DISTRICT OF NEVADA**

24           LT GAME INTERNATIONAL LTD.,

25           CASE NO. \_\_\_\_\_

26           Plaintiff,

27           **COMPLAINT**

28           v.  
29           SHUFFLE MASTER, INC.,

30           **JURY TRIAL DEMANDED**

31           Defendant.

32  
33           Plaintiff LT Game International Ltd. (“Plaintiff”) for its Complaint against Defendant  
34           Shuffle Master, Inc. (“Defendant”) alleges as follows:

35  
36           **PRELIMINARY STATEMENT**

37           1.       This is an action for unfair competition under federal law, the State of Nevada  
38           common law, Macau commercial code and tortious interference with prospective business and  
39           contractual relations.

40  
41           **PARTIES**

42           2.       Plaintiff is a company incorporated under the law of Ontario, Canada and is  
43           located at 4350 Steeles Ave. E, Market Village, Box 15 2/F, Unit A103 Markham Ontario L3R  
44           9V4 Canada.

1           3. Plaintiff is the exclusive agent and licensee of LT Game Ltd.'s technology,  
 2 intellectual property and products in North America including Las Vegas, Nevada.

3           4. The Defendant is located at 1106 Palms Airport Drive, Las Vegas, NV, 89119.

4           **JURISDICTION AND VENUE**

5           5. The Court has subject matter jurisdiction over this action pursuant to 28 U.S.C.  
 6 §1331, §1338, and §1367 as the present case arises under the Lanham Act, 15 U.S.C. §1051 et  
 7 seq., and as is hereinafter more fully described.

8           6. The Court also has subject matter jurisdiction over this action pursuant to 28  
 9 U.S.C. §1332, as the controversy is between citizens of different states, and the amount in  
 10 controversy exceeds \$75,000, exclusive of interest and costs.

11           7. Venue is proper in this district pursuant to 28 U.S.C. § 1391.

12           8. Defendant is headquartered in this Judicial District and accordingly is subject to  
 13 the Jurisdiction of this Court.

14           **BACKGROUND**

15           9. The Plaintiff is in the business of marketing and sale of technologically  
 16 innovative gaming and casino products to customers in North America and in Las Vegas,  
 17 Nevada.

18           10. Defendant is a direct competitor of the Plaintiff in the business of marketing and  
 19 sale of gaming and casino products to customers in the gaming and casino industry around the  
 20 world and in Las Vegas, Nevada.

21           11. Over the past year, Defendant has begun an international campaign of  
 22 disparagement of Plaintiff and its products and has directly and indirectly interfered with  
 23 Plaintiff's business and potential business activities, dealings and contracts with customers in  
 24 the United States and in Las Vegas, Nevada.

25           12. Defendant has made misrepresentations about the Plaintiff and its products at  
 26 international trade shows and directly and indirectly to Plaintiff's current and prospective  
 27 customers in the gaming and casino industry around the world and in Las Vegas, Nevada,

1 including but not limited to such customers as the Venetian and Sands, that have undermined  
2 and negatively impacted Plaintiff's business reputation and prospective deals and contracts.

3       13. Defendant is engaging in this course of action willfully and with full knowledge  
4 and intent to interfere and damage Plaintiff's business deals with its current and prospect  
5 customers.

6       14. Plaintiff has no adequate remedy at law.

7                   **COUNT I – UNFAIR COMPETITION (LANHAM ACT)**

8       15. Plaintiff repeats each and every allegation set forth herein in the preceding  
9 paragraphs as though fully set forth herein.

10       16. Defendant's aforesaid activities constitute unfair competition under the federal  
11 Lanham Act.

12       17. Defendant's aforesaid activities have damaged and cause irreparable harm to the  
13 Plaintiff.

14                   **COUNT II – UNFAIR COMPETITION (NEVADA COMMON LAW)**

15       18. Plaintiff repeats each and every allegation set forth herein in the preceding  
16 paragraphs as though fully set forth herein.

17       19. Defendant's aforesaid activities constitute unfair competition under State of  
18 Nevada's common law.

19       20. Defendant's aforesaid activities have damaged and cause irreparable harm to the  
20 Plaintiff.

21                   **COUNT III – UNFAIR COMPETITION**  
22                   **(MACAU LAW - COMMERCIAL CODE)**

23       21. Plaintiff repeats each and every allegation set forth herein in the preceding  
24 paragraphs as though fully set forth herein.

25       22. Defendant's aforesaid activities constitute unfair competition under Macau  
26 Commercial Code Articles 156-173, Title X, Book I.

27       23. Defendant's aforesaid activities have damaged and cause irreparable harm to the  
28 Plaintiff.

1                   **COUNT IV- TORTIOUS INTERFERENCE WITH CURRENT AND PROSPECTIVE**  
 2                   **BUSINESS AND CONTRACTUAL RELATIONS**

3                   24. Plaintiff repeats each and every allegation set forth herein in the preceding  
 4                   paragraphs as though fully set forth herein.

5                   25. Plaintiff has been in communications and negotiations with current and  
 6                   prospective customers for sale of its gaming and casino products.

7                   26. Defendant has been aware of these communications and negotiations.

8                   27. Defendant, directly and through its agents, has made false claims and  
 9                   misrepresentations regarding the Plaintiff and its products in order to undermine, interfere and  
 10                   obstruct the Plaintiff from making business relations, deals and contracts for the sale of its  
 11                   products with its current and prospective customers.

12                   28. Defendant's aforesaid actions have undermined and damaged Plaintiff's business  
 13                   relations with its current and prospective customers and have resulted in the loss of business  
 14                   deals and contracts.

15                   29. Defendant's aforesaid activities have damaged and caused irreparable harm to  
 16                   the Plaintiff.

17                   **REQUESTED RELIEF**

18                   **WHEREFORE**, Plaintiff prays that:

19                   A. Defendant, its agents, servants, employees, franchisees, licensees, attorneys and  
 20                   all others in active concert or participation with Defendant, be enjoined and restrained,  
 21                   permanently from:

22                   1. Making any false or misleading representation regarding the Plaintiff  
 23                   and/or their products to the public, the gaming and casino industry, and any current or  
 24                   prospect customer of the Plaintiff.

25                   2. Unfairly competing with the Plaintiff in any manner.

26                   B. Plaintiff recovers Defendant's profits, as well as the damages sustained by  
 27                   Plaintiff as a result of Defendant's unlawful actions, such amount of profits and damages to be  
 28                   trebled;

C. Defendant be required to pay Plaintiff the costs of this action, together with reasonable attorneys' fees and disbursements;

D. Plaintiff be awarded statutory damages pursuant to the Lanham Act; and

F. This Court award Plaintiff any other relief that this Court deems just and proper.

**DEMAND FOR JURY TRIAL**

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Plaintiff demands a trial by jury of all issues properly triable by jury in this action.

RESPECTFULLY SUBMITTED this 10<sup>th</sup> day of July, 2012.

McDONALD CARANO WILSON LLP

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